

FILED BY **MB** D.C.

Feb 12, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTP

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NUMBER: 25-MJ-00018-SMM

UNITED STATES OF AMERICA,

v.

CRISTOBAL ANDRES LORENZO-SEBASTIAN,

Defendant.

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? **No.**
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? **No.**
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? **No.**
4. Did this matter involve the participation of or consultation now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? **No.**

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By:

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AO 91 (Rev. 11/11) Criminal Complaint

AUSA Jessica Kahn Obenauf

UNITED STATES DISTRICT COURT

for the

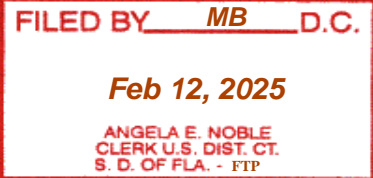
Southern District of Florida

United States of America
v.

CRISTOBAL ANDRES
LORENZO-SEBASTIAN,

Case No. 25-MJ-00018-SMM

Defendant(s)



CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 7, 2025 in the county of Martin in the
Southern District of Florida, the defendant(s) violated:

Code Section

8 U.S.C. § 1326(a)

Offense Description

Previously Removed Alien Found in the United States.

This criminal complaint is based on these facts:

-SEE ATTACHED AFFIDAVIT-

☒ Continued on the attached sheet.

Complainant's signature

Angelo Zaravelis, Deportation Officer, ICE/DHS

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by in person.

Date: 2/12/25

Judge's signature

City and state: Fort Pierce, Florida

Shaniek Mills Maynard, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Angelo Zaravelis, being duly sworn, depose and state as follows:

1. I am a Deportation Officer of the United States Department of Homeland Security, Immigration and Customs Enforcement ("ICE"), and have been employed in a similar capacity since 2007. I am currently assigned to Enforcement and Removal Operations, Criminal Apprehension Program, Stuart, Florida. As a Deportation Officer with ICE, my duties and responsibilities include enforcing criminal and administrative immigration laws of the United States. I have also conducted and participated in investigations of this nature.

2. This affidavit is based upon my own knowledge as well as information provided to me by other law enforcement officers. This affidavit does not set forth every fact known to me regarding the investigation but only those facts necessary to establish probable cause to believe that Cristobal Andres LORENZO-SEBASTIAN ("LORENZO-SEBASTIAN") committed the offense of being a previously removed alien found in the United States, in violation of Title 8, United States Code, Sections 1326(a).


3. On or about January 7, 2025, LORENZO-SEBASTIAN was arrested in Martin County, Florida on an out-of-county warrant. Martin County Jail booking officials notified the Stuart, Florida ICE office due to LORENZO-SEBASTIAN reporting a foreign place of birth, which alerted ICE to LORENZO-SEBASTIAN's presence in the United States.

4. I reviewed documents from the immigration alien file belonging to LORENZO-SEBASTIAN, AXXX XXX 978. A review of Department of Homeland Security electronic records and the immigration alien file assigned to LORENZO-SEBASTIAN show that he is a native and citizen of Guatemala. Records show that on or about May 14, 2013, LORENZO-SEBASTIAN was ordered removed from the United States. Records in the alien file show that on or about August 28, 2013, LORENZO-SEBASTIAN was removed from the United States to Guatemala.

5. LORENZO-SEBASTIAN's fingerprints taken in connection with his January 7, 2025, arrest in Martin County were scanned into the IDENT system, a biometric database maintained by the Department of Homeland Security. Results confirmed that the fingerprints belong to the individual who was previously removed from the United States, that is, Cristobal Andres LORENZO-SEBASTIAN.

6. A record check was performed in the Computer Linked Application Informational Management System ("CLAIMS") to determine if LORENZO-SEBASTIAN had filed an application for permission to reapply for admission into the United States after deportation or removal. After a search was performed in that database system, no record was found to exist indicating that LORENZO-SEBASTIAN obtained consent from the Attorney General of the United States or from the Secretary of Homeland Security, for re-admission into the United States as required by law.

7. Based on the foregoing, there exists probable cause to believe that, on or about January 7, 2025, Cristobal Andres LORENZO-SEBASTIAN, an alien who has previously been deported and removed from the United States, was found in the United States without having received the express consent from the Attorney General or the Secretary of the Department of Homeland Security for re-admission into the United States, in violation of Title 8, United States Code, Section 1326(a).



Angelo Zaravelis
Deportation Officer
Immigration and Customs Enforcement

Subscribed and sworn to before me, ^{in person} ~~by videoconference~~, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure, in Fort Pierce, Florida, this 12th day of February, 2025.



SHANIEK MILLS MAYNARD
UNITED STATES MAGISTRATE JUDGE